

Pg. 11 of 15) Citations To Relevant Cases And
Statutory Authorities

Here Within This Petitioner's, 28-U.S.C. 2254
Habeas Corpus; and the Grounds Therein;
And To Include, The Eleventh Appellate
District Appeal Courts, Defendants,
Assignments Of Error's, To Wit;

(I.) The Trial Court Committed Plain Error,
To The Substantial Prejudice Of The Defendant
By Denying The Motion To Remove Juror
Number (20) For Cause; (Citing), *Cottin V. United States*,
156 U.S. 432, 15 S.Ct. 294, 32 L. Ed. 481. (1895)

(II.) Defendant's Counsel Was Constitutionally
Ineffective By Failing To Utilize A Peremptory
Challenge To Remove Juror Number (20);
(Citing), *Berk V. Matthews*, 53 Ohio St. 3d 161, 559,
N.E. 2d 1301 (1990).

(III.) The Jury's Guilty Verdict's Are Against The
Manifest Weight Of The Evidence; (Citing), *Tibbs*
- V. - Florida, 457 U.S. 31, 102 S. Ct. 2211, 72
L. Ed. 2d 652 (1982) > A Federal-Case.

(IV.) The Trial Court Erred By Imposing Consecutive
Sentences Because The Record Clearly And
Convincingly Does Not Support A Finding That Multiple
Offenses Were Committed, as a Course of Conduct...

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[State-Cases]

(Citing), Cross v. Ledford, 161 Ohio St. 469,
120 N.E. 2d 118 (1954). Also (Citing);

State v. Adams, 2d Dist Clark No. 2014-CA-13.

Herein And Through-out This Petitioner's,
Exhaustion Of His State Remedies; Appeals
Motions, Petitions, are "Echo's" thereof the
Injustice Committed Within This Petitioner's
Case; And More-Over The States Ability To
Avoid, Ignore And Dismiss There Opportunities
Therefore "Corrective Justice" each time.

Later These Opposing Party Will (Say), this
Petitioner failed To Use All of His,
"State Remedies"; [But wait a minute; I'm
Sorry; they already did].

The Miscarriage Of Justice, Within This
Petitioner, Keith L. Cooper Case; has been
Reckless With Intent, By This Common Pleas
Court Judge, the Prosecution; And Sadly, This
Defendant's Criminal Defense Attorney.

• Matter Of Record-And-Matter Of Law Was Disregarded,
pursuant to these Alleged Victims Criminal History.

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This Petitioner, Moves This Honorable Court To View - It "quote" made by a Juror;

The trial Court denied a Challenge for Cause to Juror Number (20), who answered that "he believed that there "Should be no presumption of innocence" and that prior to hearing any evidence, "the number of victims" indicated to him that Defendant Cooper was "Probably - Guilty". [After that Point This Defendant, Keith R. Cooper, was still presumed Innocent].

- Why Didn't This Common Pleas Court Judge, Move for It "Mis-Trial"?.

Defendant Cooper made Motions for judgment of Acquittal after the State's Case and after the Close of evidence, both of which were denied.

- This Defendant Should Have Been Acquitted, had it not been for this Judge's Bias, against him.
- Plain Error Was Evident, but pursuant to the standards of The United States Supreme Court, "Plain Error They Are Not", but yet with intent. This Ground/Assignment of error should have been in favor of Cooper.

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This Opposition's, Respondent's Answer/Return Of Writ, appears to be solely based on "Alluding And Over-breadth" of There Own Personal Opinions, Thus Mixed With, There "Hypotheses"; To Writ, They Claim To Be Factually Correct;

Concerning What This United States District Court, Northern District Court Of Ohio; Can And/or Can Not Do, And/or Review, And/or Accept As A "Mitigating" Circumstance That May Or May Not Be In Favor Of This Petitioner's 28-USC.-2254 Habeas Corpus.

(Citing) The Fourteenth Amendment, Section (1).
Section (2). Sections (3). Section (4). And
Section (5); The Rights Thereof A
Citizen or Citizens Of The United States
and of the State wherein they reside.

No State Shall make or enforce any law which shall abridge the privileges or immunities of Citizens of the United States; Nor shall any person within its jurisdiction And/or State deprive any person of life, liberty, or property, without due process of law; Nor deny equal protection of the laws.

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- This State Prosecution, Did Not Find, Nor, Demonstrate Rational Trier Of Facts To Find Each Element Of The Crime Beyond A Reasonable Doubt.
- The Alleged Victims Testimonies Where [Contrary] To All Of There Police Reports; And They Where Explicitly Conflicting. They Where "Not" Sufficient Weight Of Evidence To Thus, Support Any And All Convictions.
- * Please Note That The Common Pleas Court And Prosecutor, And There Assigned Counsel, Failed To Provide The Alleged - Victims Individual Police Reports Within The "State Court Records," And Documents That Where So Ordered By This Honorable United States District Court. "Why Where Those Documents Excluded"?
- This Petitioner Respectfully Moves This Honorable Court, To Dismiss This Oppositions, "Respondent's Answer/Return Of Writ;" Of Which Was Two Days Late, And Past The Ordered And Required Dead-line. How Dare They Argue Time Statute Of Limitations, In Commit A Time-Limitation Offense, pursuant to there own Agreements.

Conclusion

The Petitioner Moves this Honorable Federal Habeas Corpus Court to "Dismiss" the Respondent's Answer / Return of Writ, And it request, for the Serious Reasons, Set Forth herein. Because the Case Can be decided from the records And Police Reports Conflicting Statements And The Bias-ed Abuse of Discretion, And Extended Leverage & Partiality Demonstrated By This Common Pleas Court, Judge. And A Evidentiary Hearing Shall Confirm And Affirm This Petitioners Facts, Findings And Conclusions of Law.

This is a Request Therefore Evidentiary Hearings, To Proceed, And/or And Acquittal.

Respectfully Submitted, By,

s. K. Cooper

Keith H. Cooper, Pro-Se: # 774-191

Richland Correctional Institution

P.O. Box 8107

Mansfield, Ohio, 44905

Dated, April 25, 2024

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing Traverse To Return Of Suit.
was sent to: Dave Vost Attorney General at: 30 E. Broad Street
237L, Columbus, Ohio, 43215 by regular U.S. Mail, postage prepaid, on this 25 day
of April, 2024.

18 KL Cooper
Keith L. Cooper, A 224-191
(Name & Number)

Defendant, Pro Se